

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:	:	
	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	

**CERTIFICATION OF COMPLIANCE WITH
MAY 13, 2014 ORDER GRANTING CREDITORS' MOTION TO COMPEL**

Pursuant to Paragraph 4 of the Court's May 13, 2014 *Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief* [Doc. No. 4710] (the "May 13 Order"), National Public Finance Guarantee Corporation ("National") hereby states that it is in compliance with the provisions set forth in Paragraph 2 of the May 13 Order as follows:

1. National is in compliance with Paragraph 2.a.
2. National is in compliance with Paragraph 2.b consistent with the standard for reasonably accessible electronically stored information under Federal Rule of Civil Procedure 26(b)(2)(B). National's lead counsel, Sidley Austin LLP, may have electronic copies of the City of Detroit's May 6, 2014 document production (the "Production") held on its disaster recovery backup systems. Such copies of the Production constitute inaccessible electronically stored information under Rule 26(b)(2)(B) because the disaster recovery system is entirely

inaccessible to National's counsel, stores data in an undifferentiated manner, and is only for disaster recovery purposes, not long-term record retention. Sidley Austin LLP expects that any copy of the Production that exists on the disaster recovery systems will delete automatically consistent with the system's customary deletion procedures.

3. National is in compliance with Paragraph 2.c.

4. National is in compliance with Paragraph 2.d.

Dated: May 14, 2014

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